

THE SUPERIOR COURT, STATE OF CALIFORNIA
For the County of Santa Barbara
Figueroa Division

THE PEOPLE OF THE STATE OF CALIFORNIA

vs.

RAYMOND VICTOR MORUA
AKA: RAYMOND V MORUA
AKA: RAYMOND MORVA

Plaintiff,

DOB: 03/05/1981

Defendant.

DA No. 13-12-324226

Court No. 1442508

**1st AMENDED
FELONY COMPLAINT**

AB109 INELIGIBLE

Breath: 0.16

Breath: 0.17

The undersigned is informed and believes that:

COUNT 1

On or about December 6, 2013, in the County of Santa Barbara, the crime of MURDER, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by RAYMOND VICTOR MORUA, who did unlawfully, and with malice aforethought murder M. R. DIES, a human being.

It is further alleged that the above offense is a serious felony within the meaning of **Penal Code Section 1192.7(c)(1)**.

It is further alleged that the above offense is a violent felony within the meaning of **Penal Code Section 667.5(c)(1)**.

COUNT 2

On or about December 6, 2013, in the County of Santa Barbara, the crime of GROSS VEHICULAR MANSLAUGHTER WHILE INTOXICATED, in violation of **PENAL CODE SECTION 191.5(a)**, a Felony, was committed by RAYMOND VICTOR MORUA, who did unlawfully kill M. R. DIES, a human being, without malice aforethought, in the driving of a vehicle in violation of Vehicle Code Sections 23140, 23152 and 23153 and the killing was proximate result of the commission of an unlawful act, not amounting to a felony and with gross negligence and/or proximate result of the commission of a lawful act which might produce death, in an unlawful manner, and with gross negligence and/or proximate result of the commission of an unlawful act, not amounting to a felony, and with gross negligence and the proximate result of the commission of lawful act which might produce death, in an unlawful manner, and with gross negligence.

It is further alleged that the above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) (8).

SPEC ALLEG-PRIOR CONVICTIONS
PENAL CODE SECTION 191.5(d)

It is further alleged that the **RAYMOND VICTOR MORUA** has suffered the following prior convictions:

<u>CONV/DT</u>	<u>SEC/VIOL</u>	<u>DKT/NO</u>	<u>TYPE/COURT</u>	<u>JURISDICTION</u>
11-14-2006	VC23152(a)	2006027017	SUPERIOR	VENTURA
05-16-2007	VC23152(b)	2006037233	SUPERIOR	VENTURA

SPEC ALLEG-FLEEING THE SCENE OF THE CRIME

It is further alleged pursuant to Vehicle Code section 20001(c), that after committing the above offense, the defendant fled the scene of the crime.

SPEC ALLEG – SERIOUS/VIOLENT FELONY

It is further alleged Counts 1 and 2, that the above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and/or a violent felony described in subdivision(s) of Penal Code section 667.5, pursuant to Penal Code section 1170(h), that the defendant is ineligible for a state prison sentence to be served in the county jail.

“NOTICE: Pursuant to Penal Code section 1170(f), notwithstanding any other provisions of this section, for purposes of subdivision (h) of section 1170, any allegation that a defendant is ineligible for a state prison sentence to be served in the county jail due to a prior or current conviction, or sentence enhancement, or because the legislature specifically excluded the offense, shall not be subject to dismissal pursuant to §1385 PC.”

COUNT 3

On or about December 6, 2013, in the County of Santa Barbara, the crime of LEAVING THE SCENE OF AN ACCIDENT THAT RESULTED IN DEATH, in violation of **VEHICLE CODE SECTION 20001(b)(2)**, a Felony, was committed by **RAYMOND VICTOR MORUA**, who did unlawfully, and knowingly, being a driver of a vehicle involved in an accident resulting in death to a person other than himself, fail, refuse, or neglect to give to the injured person or to a traffic police officer at the scene of the accident his/her name and address, the registration number of his/her vehicle, and the name of the owner of said vehicle; to exhibit his/her operator's license; to render reasonable assistance to the injured person; and perform the duties specified in Vehicle Code Sections 20003 and 20004.

* * * * *

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 3 COUNT(S).

Executed at Santa Barbara, California, on December 11, 2013.



ARNIS TOLKS
SENIOR DEPUTY DISTRICT ATTORNEY

Agency: SBPD

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>DRIVER'S LICENSE</u>	<u>STS</u>	<u>COURT DATE</u>
Raymond Victor Morua mr	M	H	508	185	BRO	BLK	B9551633	IC	12/10/2013